

This comment is in response to the proposed issue in the NPRM that would directly impact person's traveling with their legal assistance dogs. The new rule states that airlines may require passengers like myself to pay for an extra seat if my dog is not a little dog and can't fit in the small leg room allotted between rows for each passenger. If I am unable to pay for that extra seat, I must send my dog as cargo, or perhaps hope to get a later flight.

Sir, those options are not reasonable. They are indeed discriminatory against a person who maintains their freedom of mobility by the use of a specially trained dog. I have a condition that affects my balance AND ability to walk unaided. A small dog such as those used by the hearing impaired, is of no help to me. I need a dog tall enough and strong enough to be my balancing assistant or to pull my wheelchair at those times when I am too weak to walk. This partner is a medical appliance that just happens to be a living thing. The existing policy cited within the NPRM forces me to give up my right to maintain my independence, or give up the right to equal use of the air line industry.

We ask for bulk head seating ahead of time because that row used to have a little bit more leg room for the passenger. Then we are told that we can't request such seating ahead of time. Then when we get to the counter to check in and ask for a bulkhead seat, the employee informs us that we had to request that 24 hours ago. And now, the newer airplanes being built today have made that row into an exit row effectively closing off that option for us.

I know that airlines are companies whose sole purpose is to make profits for their shareholders through the business of providing air flight service. But there is or seems to be a deliberate intension to exclude the portion of the public who happen to be disabled from using those services.

Are you aware that the majority of persons with severe disabilities are living at or below the poverty line. In order for us to get the amount of money required to purchase one ticket to visit distant family members may take years! And now it is proposed that we, just because we are different must either pay twice what anyone else does, or be unable to partake of the service.

My family members have pooled resources in the past so that I could be with them at important times like the death of a parent or sibling's wedding. Buying two tickets for me would not have been possible.

I belong to an organization that offers information and assistance to person's like myself. I wish to state a proposal made by Mr. Ed Ames the president of the International Association of Assistance Dog Partners which he has offered as a reasonable proposal.

You in this paragraph refers to the air carrier

"you may offer the passenger sitting in a seat adjacent to the disabled passenger traveling with a large service dog a seat in the same class of service in a different part of the cabin. IF no seats are available, you may ask for volunteers willing to occupy the seat next to the disabled passenger requiring sharing of leg room. If no volunteer is forthcoming and seats are available in another class of service, you may ask either the disabled passenger or the person who is adjacent to him or her, to move to a seat in the other class of service.

All of the above mentioned options fall well within the requirements of reasonable accomodation. This example is of a rather rare occurrence as the number of disabled individuals with Service Animals who are actually able to use

the airline services is relatively low. However, the DOT has a responsibility to all citizens of this country, and that must include disabled persons. For over 25 years the assistance dog movement has made positive strides towards inclusion in society and worked for the advancement of our civil rights. The NPRM cites policy that currently effectively removes our access rights by authorizing the airlines to ignore the Federal Law that granted equal access to all persons regardless of handicap or disability, simply for their own convenience without exploring other means that would not separate a disabled handler from their service animal. That person would then be at the mercy of the airline personnel to assist them with things such as transferring from a wheelchair to the cabin seat, to reach for items out of reach either because they are too high for access or the person cannot bend adequately to remove his carry on from under the seat for needed medications. It is further demeaning to both passenger and cabin attendant to have to physically assist that individual in getting to the lavatory. They are not required to do this anyway, SO why are they further diminishing the dignity and basic civil rights of a disabled passenger with policy cited in the NPRM.

I ask that officials from the DOT take decisive action now and please consider adopting the common sense options and language thoughtfully mentioned by Mr. Ames. There is an estimated 20,000 Service Animal teams in the United States. Only a small minority can afford to make use of the airline services anyway, so why take away the rights of a few just to increase the profit margin of the corporate many?

The above mentioned proposal does not hinder the airlines or impose unreasonable accommodations be met by the airline industry, either. To single out a disabled person for corporate abuse sanctioned by our Federal government is not something that our country's constitution was written to allow. Please take action to fix this situation.

MS. Polly A Callant of
Twin Falls, Idaho,
Citizen of the United States of America
and member of the voting public.